

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

YELLOW CORPORATION, *et al.*,¹

Debtors.

Chapter 11

Case No. 23-11069 (CTG)

(Jointly Administered)

Re: Dkt. Nos. 968, 1096

**SUPPLEMENT TO OBJECTION OF LINK LOGISTICS REAL ESTATE
MANAGEMENT LLC, BREIT INDUSTRIAL CANYON GA1B01 LLC, GPT ELKRIDGE
TERMINAL OWNER LLC, GPT DEER PARK TERMINAL OWNER LLC, AND GPT
ORLANDO TERMINAL OWNER LLC, TO DEBTORS' NOTICE OF POTENTIAL
ASSUMPTION OR ASSUMPTION AND ASSIGNMENT OF CERTAIN CONTRACTS
OR LEASES ASSOCIATED WITH THE NON-ROLLING STOCK ASSETS**

Link Logistics Real Estate Management LLC and its affiliates GPT Orlando Terminal Owner LLC, GPT ElkrIDGE Terminal Owner LLC, GPT Deer Park Terminal Owner LLC, and BREIT Industrial Canyon GA1B01 LLC (collectively, “**Link Logistics**”) hereby submit this supplement to their objection [Dkt. 1096] (the “**Cure Objection**”) to the Debtors’ *Notice of Potential Assumption or Assumption and Assignment of Certain Contracts or Leases Associated with the Non-Rolling Stock Assets* (“**Cure Notice**”) [Dkt. 968], and respectfully state as follows.

STATEMENT

1. Link Logistics owns and/or manages the four (4) real property locations described on the attached **Exhibit A**, which are terminals leased by the Debtors pursuant to written agreements (the “**Leases**”). The Cure Notice identified each of the Leases as potentially being assumed and assigned in connection with the Debtors’ pending sale process, subject among other

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of Debtors’ principal place of business and the Debtors’ service address in these chapter 11 cases is: 11500 Outlook Street, Suite 400, Overland Park, Kansas 66211.

things to payment of the corresponding amount set forth therein (the “**Debtor Cure Amounts**”). Link Logistics identified the undisputed and/or correct amounts then-currently due and owing for each Lease in Exhibit A to the Cure Objection (the “**Lessor Cure Amounts**”).

2. As noted in the Cure Objection, the Debtors continue to accrue or incur additional charges under each Lease, including but not limited to rent, taxes, common area maintenance, and other costs, and any such outstanding charges must be satisfied in full in connection with any assumption or assignment of such Lease. Since the filing of the Cure Objection, the Debtors have incurred certain additional such charges with respect to the Leases such that the current Lessor Cure Amounts are reflected on **Exhibit A** hereto.

RESERVATION OF RIGHTS

3. Link Logistics reserves the right to amend and/or supplement the Cure Objection and its cure claims, and to raise other and further objections to the assumption and assignment or cure amounts with respect to the Leases, including without limitation with respect to adequate assurance of future performance.

Dated: December 15, 2023

GELLERT SCALI BUSENKELL & BROWN, LLC

/s/ Michael Van Gorder

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EXHIBIT A

Property Address	Description of Lease	Lessor	Debtor Cure Amount	Lessor Cure Amount
6351 S Hanover Road, Elkridge MD 21075-9998	Real Property Lease - Terminal	GPT Elkridge Terminal Owner LLC	\$51,220	\$129,706.51
50 Burt Drive, Deer Park, NY 11729	Real Property Lease - Terminal	GPT Deer Park Terminal Owner LLC	\$31,883	\$6,545.54
1265 LaQuinta Drive, Orlando, FL 32809	Real Property Lease - Terminal	GPT Orlando Terminal Owner LLC	\$43,645	\$221,616.87
1250 Terminus Drive Lithia Springs, GA 30122	Real Property Lease - Terminal	BREIT Industrial Canyon GA 1B01 LLC	\$71,062	\$207,332.35*

**The Debtors have sought to reject this lease as of 10/31/23 [Dkt. 1018]. Link Logistics does not object to the rejection but has objected to the proposed effective date [Dkt. 1148].*